

UNITED STATES DISTRICT COURT FOR
THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

DIANE RICHARD-ALLERDYCE, ET. AL,)	
)	CAUSE NO.: 1:23-CV-00796-MWM
)	
Plaintiffs,)	
)	
v.)	JUDGE MATTHEW W. MCFARLAND
)	
UNION INSTITUTE AND UNIVERSITY,)	
ET. AL,)	
)	
Defendants.)	

**PLAINTIFFS' NOTICE OF FILING A MOTION FOR RELIEF FROM STAY TO
PURSUE INSURANCE PROCEEDS AND ABANDONMENT OF INSURANCE
PROCEEDS**

Plaintiffs, through undersigned counsel, provide notice to this Court that April 16, 2025 they filed an appearance as creditors and a Motion for Relief from Stay to Pursue Insurance Proceeds and Abandonment of Insurance Proceeds in the United States Bankruptcy Court for the Southern District of Ohio in styled In re: The Matter of Union Institute & University, et al., Case No. 1:25-bk-10562. The matter is pending before the honorable Judge Beth A. Buchanan. The Section 341 Bankruptcy Meeting is scheduled for today, April 17, 2025 at 2:30 PM. Attached for the Court's review are: United States Bankruptcy Court ECF No. 27, Notice of Appearance and Request for Notice, attached as **Exhibit A**; United States Bankruptcy Court ECF No. 28, Motion for Relief from Stay to Pursue Insurance Proceeds and Abandonment of Insurance Proceeds attached as Exhibit B; and United States Bankruptcy Court ECF 29, Certificate of Service, attached as **Exhibit C**.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on April 17, 2025, a copy of the foregoing was filed electronically. Notice of this filing will be sent to the following parties by operation of the Court's CM/ECF system.

/s/Robert E. DeRose
Robert E. DeRose (OH Bar No. 0055214)